

REMARKS

Applicants have carefully reviewed this Application in light of the Office Action mailed August 9, 2005. Claims 1-8 are pending in this Application and Claims 9-20 were previously cancelled without prejudice or disclaimer due to an election/restriction requirement. Claims 1-8 stand rejected under 35 U.S.C. §103(a). Applicants have amended Claim 1 to further define various features of Applicants' invention. Applicants have added Claims 21-32 and submit that the claims add no new matter. Applicants respectfully request reconsideration and favorable action in this case.

Rejections under 35 U.S.C. §103

Claims 1-8 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,400,730 issued to Latif et al. ("*Latif*") in view of U.S. Patent No. 6,721,818 issued to Nakamura ("*Nakamura*").

Latif discloses methods and apparatus for receiving, translating, and routing data packets between SCSI, Fibre Channel and Ethernet devices in a flexible, programmable manner. An SoIP device may be uniquely identified by an IP address and SoIP socket number. (Col. 10, Lines 57-59). An SoIP switch assigns the SOIP socket number for a device by choosing any value that results in a unique IP Address/SoIP socket number combination. (Col. 11, Line 65 to Col. 12, Line 5).

Nakamura discloses a communication network wherein a plurality of devices can be interconnected.

Claim 1, as amended, recites a method comprising the step of "allocating a location section of the internal port address corresponding to the location of the network device within the system."

Claims 21 and 28 recite a method comprising the step of "allocating a location section of the internal port address corresponding to the location of the network device within the system."

Applicants respectfully submit that the cited references fail to disclose every element of Applicants' invention as amended. Further, there is no motivation, teaching, or suggestion

to combine *Latif* and *Nakamura*. *Latif* and *Nakamura*, either alone or in combination, fail to teach at least “allocating a location section of the internal port address corresponding to the location of the network device within the system,” as recited by amended Claim 1. Additionally, *Latif* or *Nakamura* fail to teach a method for assigning an internal port address to uniquely identify a port associated with a routing processor of a network device associated with, and having a location within, a system comprising the step of “allocating a location section of the internal port address corresponding to the location of the network device within the system,” as recited by Claims 21 and 28.

With respect to Claim 1, the Examiner states that *Latif* “teaches a method . . . comprising: allocating a location section of the internal port address corresponding to the location of the network device, (col. 11, line 64-col. 12, line 67).” (Office Action, Page 2). In contrast, *Latif* teaches away from “allocating a location section of the internal port address corresponding to the location of the network device within the system,” as recited in amended Claim 1. Specifically, *Latif* teaches that, “[w]hen the SoIP socket number is assigned locally, the value chosen may be any value that results in a unique IP Address/SoIP socket number combination.” (Col. 12, Lines 2-5) (emphasis added). Additionally, *Latif* teaches that the “assignment of the SoIP socket number is based on an incrementing number that can be used as an index into an address table.” (Col. 12, Lines 37-40). *Latif*, therefore, fails to teach “allocating a location section of the internal port address corresponding to the location of the network device within the system,” as recited in amended Claim 1. The cited references, therefore, fail to disclose the recited limitations and cannot render obvious Claims 1, 21 and 28.

Given that Claims 2-8 depend from Claim 21, Claims 22-27 depend from Claim 21 and Claims 29-32 depend from Claim 28, Applicants respectfully submit that Claims 2-8, 22-27 and 29-32 are allowable. As such, Applicants respectfully request that the Examiner allow Claims 1-8 and 21-32.

Information Disclosure Statement

Applicants would like to bring to the Examiner's attention that Applicants filed an Information Disclosure Statement on August 16, 2005. Applicants respectfully request that the Information Disclosure Statement be considered and cited in the examination of the above-referenced application. Applicants attach a copy of the Information Disclosure Statement and PTO Form 1449 filed August 16, 2005, along with a copy of the postcard receipt evidencing receipt by the Patent Office, for the Examiner's convenience

Change of Correspondence Address

Applicants respectfully request that all papers pertaining to the above-captioned patent application be directed to Customer No. **31625** and all telephone calls should be directed to Paula D. Heyman at 512.322.2581.

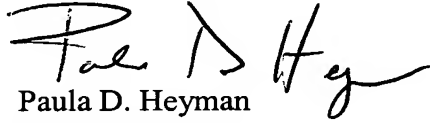
CONCLUSION

Applicants appreciate the Examiner's careful review of the application. Applicants have now made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. For the foregoing reasons, Applicants respectfully request reconsideration of Claims 1-8 and 21-32, as amended.

Applicants believe there are no fees due at this time, however, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2581.

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorney for Applicants


Paula D. Heyman
Reg. No. 48,363

Date: Nov. 9, 2005

SEND CORRESPONDENCE TO:
BAKER BOTTS L.L.P.
CUSTOMER ACCOUNT NO. **31625**
512.322.2581
512.322.8328 (fax)